

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

DR. SARI EDELMAN,

Plaintiff,

– against –

NYU LANGONE HEALTH SYSTEM, NYU LANGONE HOSPITALS, NYU LANGONE MEDICAL CENTER, NYU LANGONE NASSAU RHEUMATOLOGY, NYU SCHOOL OF MEDICINE, NYU GROSSMAN SCHOOL OF MEDICINE, NYU HOSPITALS CENTER, ANDREW T. RUBIN, DAVID KAPLAN, JOSEPH ANTONIK, and JOSHUA SWIRNOW,

Defendants.

Case No. 1:21-cv-502 (LJL)

**DECLARATION OF  
RICHARD L. STEER IN  
OPPOSITION TO PLAINTIFF'S  
MOTION FOR JUDGMENT AS A  
MATTER OF LAW OR,  
ALTERNATIVELY, FOR  
A NEW TRIAL**

**RICHARD L. STEER**, under penalties of perjury, hereby declares pursuant to 28 U.S.C.

§ 1746:

1. I am admitted to practice before this Court and am a Partner at the law firm of Tarter Krinsky & Drogin LLP, attorneys for Defendants NYU Langone Health System, NYU Langone Hospitals, and NYU Grossman School of Medicine, a Division of New York University, f/k/a “NYU Hospitals Center” s/h/a “NYU Langone Medical Center,” “NYU Langone Nassau Rheumatology,” “NYU School of Medicine,” “NYU Grossman School of Medicine,” and “NYU Hospitals Center”, and Andrew T. Rubin, David Kaplan, Joseph Antonik, and Joshua Swirnow.

2. As such, I am familiar with all the facts and circumstances herein based upon my personal knowledge and a review of the file maintained by this office.

3. A true and correct copy of the signed Jury Verdict Form is annexed at Exhibit 1.

4. A true and correct copy of the July 19, 2023, Court Transcript is annexed at Exhibit

2.

5. A true and correct copy of the July 10, 2023, and July 11, 2023, Court Transcript is annexed at Exhibit 3.
6. A true and correct copy of the July 17, 2023, Court Transcript is annexed at Exhibit 4.
7. A true and correct copy of the July 18, 2023, Court Transcript is annexed at Exhibit 5.
8. A true and correct copy of the July 14, 2023, Court Transcript is annexed at Exhibit 6.
9. A true and correct copy of the July 13, 2023, Court Transcript is annexed at Exhibit 7.
10. A true and correct copy of the Plaintiff's Trial Exhibits 8, 15, 24, and 31 is annexed at Exhibit 8.
  11. A true and correct copy of Plaintiff's Trial Exhibit 9 is annexed at Exhibit 9.
  12. A true and correct copy of Plaintiff's Trial Exhibit 32 is annexed at Exhibit 10.
  13. A true and correct copy of Defendants' Trial Exhibit EE is annexed at Exhibit 11.
  14. A true and correct copy of Defendants' Trial Exhibit HH is annexed at Exhibit 12.
  15. A true and correct copy of the July 12, 2023, Court Transcript is annexed at Exhibit 13.
16. A true and correct copy of the Plaintiff's memorandum of law in opposition to Defendants' motion for summary judgment (Dkt. No. 129) is annexed at Exhibit 14.
17. A true and correct copy of the Plaintiff's Trial Exhibits 35, 41, 46, and 48 is annexed at Exhibit 15.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 21, 2023.

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*/s/ Richard L. Steer*  
Richard L. Steer